UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	**MDL No. 2875**
THIS DOCUMENT RELATES TO ALL CASES	**HON. ROBERT B. KUGLER**

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Seth A. Goldberg, Esq,**
DUANE MORRIS LLP
30 South 17th Street
Philadelphia, Pennsylvania 19103
Attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Huahai U.S., Inc., Prinston Pharmaceutical Inc., and Solco Healthcare US, LLC (hereinafter "Defendants").

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Qiangming Li, Director of Analysis at Zhejiang Huahai Pharmaceutical Co., Ltd., on April 13 through 16, 2021, at 7:00 a.m. Hong Kong time (April 12 through 15, 2021, at 7 p.m. eastern time), and continuing until completion, at Duane Morris LLP, 30 South 17th Street, Philadelphia, Pennsylvania 19103, via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will be provided.

TAKING ATTORNEY FOR PLAINTIFFS:

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

April 6, 2021

PLAINTIFFS' CO-LEAD COUNSEL

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EXHIBIT A

30(B)(6) TOPICS

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:

Testing of Valsartan API

3. The testing performed by ZHP or its agents, to evaluate the purity and contents of ZHP's API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

5. The testing performed by any entity or person other than ZHP or its agents but known to ZHP, to evaluate the purity and contents of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

7. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

9. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

12. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of the solvents utilized in the manufacture of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

14. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of the solvents utilized in the manufacture of

ZHP's API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

16. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of the production equipment utilized in the manufacture of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

18. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of the production equipment utilized in the manufacture of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

20. The extent of the actual and potential nitrosamine contamination of ZHP's valsartan API and finished dose sold in the United States, both in terms of the concentration per pill, and across all of the lots/batches.

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Qiangming Li.

2. The complete production of Qiangming Li's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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